

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-2(c)

DOUGLAS G. LENEY, ESQUIRE  
ARCHER & GREINER  
A Professional Corporation  
Three Logan Square  
1717 Arch Street, Suite 3500  
Philadelphia, PA 19103  
Phone: (215) 963-3300  
Fax: (215) 963-9999  
*Attorneys for Martin Assuncao  
and Lisa Assuncao*

In re:

ASSUNCAO BROS., INC.,

Debtor.

Chapter 11 (Subchapter V)

Case No. 22-16159 (CMG)

**NOTICE OF APPEARANCE  
AND DEMAND FOR NOTICES AND PAPERS**

Please take notice that MARTIN ASSUNCAO and LISA ASSUNCAO, parties-in-interest in the above referenced case and hereby appear by their counsel, Archer & Greiner, A Professional Corporation. Archer & Greiner enters its appearance pursuant to Section 1109(b) of Chapter 11 of Title 11 of the United States Code, 11 U.S.C. §§ 101-1330 (the “Bankruptcy Code”) and Rule 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”). Pursuant to Bankruptcy Rules 2002, 3017 and 9007 and Bankruptcy Code Sections 342 and 1109(b), Archer & Greiner requests that it be added to the service list in this case as follows and that copies of all notices and pleadings given or filed in this case be given and served upon it at the following addresses:

Douglas G. Leney, Esquire  
Archer & Greiner, P.C.  
Three Logan Square  
1717 Arch Street, Suite 3500  
Philadelphia, PA 19103  
Phone: (215) 963-3300  
Fax: (215) 963-9999  
dleney@archerlaw.com

-and-

Allen G. Kadish, Esquire  
Archer & Greiner, P.C.  
1211 Avenue of the Americas  
New York, NY 10036  
Phone: (212) 682-4940  
Fax: (856) 795-0574  
akadish@archerlaw.com

Please take further notice that, pursuant to Bankruptcy Code Section 1109(b), the foregoing demand includes not only the notices and papers referred to in the Bankruptcy Rules but also includes, without limitation, any notice, application, complaint, demand, motion, petition, pleading or request, whether formal or informal, written or oral, and whether transmitted or conveyed by mail, messenger delivery, telephone facsimile, telegraph, telex or otherwise, filed or made with regard to the case and proceedings referenced herein.

This Notice of Appearance and Demand for Notices and Papers shall not be deemed or construed to be a waiver of MARTIN ASSUNCAO and LISA ASSUNCAO's rights (i) to have final orders in noncore matters entered only after *de novo* review by a District Judge, (ii) to trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related to this case and (iii) to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or of any other rights, claims, actions, setoffs, or recoupments to which MARTIN ASSUNCAO and LISA ASSUNCAO are or may be entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly reserved.

Dated: August 4, 2022

ARCHER & GREINER  
A Professional Corporation  
*Attorneys for Martin Assuncao  
and Lisa Assuncao*

By: /s/ Douglas G. Leney  
Douglas G. Leney